

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Dear Ms. Dortch:

The enclosed document contains additional comments from the Federal Aviation Administration (FAA) in the "Matter of Review of Part 87 of the Commission's Rules Concerning the Aviation Radio Service", WT Docket No. 01-289 (FCC 01-303).

The FAA understands that the reply comment period ended on April 15, 2002, therefore, we are requesting a motion to waive that deadline requirement so that the enclosed additional comments of the FAA are considered.

If you should have any questions regarding this waiver request, please contact Mr. Robert Frazier, Spectrum Planning and International Division, ASR-200, at (20) 267-9722.

Sincerely,

George K. Sakai  
Program Director for Spectrum  
Policy and Management, ASR-1

Enclosure

CC:  
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Federal Communications Commission  
445 12<sup>th</sup> Street SW  
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**FAA Additional Comments  
in the "Matter of Review of Part 87  
of the Commission's Rules  
Concerning the Aviation Radio Service"  
WT Docket No. 01-289 (FCC 01-303).**

1. **FCC Proposal:** Extend license for non-aircraft stations from 5 to 10 years (the same as for aircraft stations)

FAA Comment: The FAA recommends that you maintain the 5-year license and possibly adjust the licensing fee.

2. **FCC Proposal**

Additional station class codes.

Three new classes for ground control technology and procedures

Remote Communications Outlet, RCO

Ground Communication Outlet, Ramp Control, RPC

To increase accuracy of data base, add

RADAR/TEST (RLD)

Radio Navigation Land/DME(RNV)

FAA Supports these new station class codes.

3. **FAA opposes** temporary call signs for A/C under provision of wet lease.  
Temporary call signs are not recommended. They could hinder the identification of the operator.

4. **FCC Proposal.** Seek comment on how we can better inform all segments of the aviation community that an aircraft operating under the authority of a station license or licensed by rule may only transmit on the frequencies for which the aircraft is eligible.

FAA suggests a permanent placard on the unit clearly visible to the user indicating that the radio can only be used in accordance with provisions of Part 87 of the Commission's Rules.

5. **§ 87.305 Frequency coordination**

The FAA recommends the following changes be made to clarify the identify of the "frequency advisory committee".

- (a)(1). Each application for a new station license, renewal or modification of an existing license concerning flight test frequencies, except as provided in

paragraph (b) of this section, must be accompanied by a statement from the Aerospace & Flight Test Radio Coordinating Council (AFTRCC). The contact person is the Chairman, AFTRCC. Information can be obtained from their web site: www.aftfcc.org.~~a frequency advisory committee.~~

~~(2) The frequency advisory committee must be organized to represent all persons who are eligible for non-Government radio flight test stations. A statement of organization service area and composition of the committee must be submitted to the Commission for approval. The functions of any advisory committee are purely advisory to the applicant and the Commission, and its recommendations are not binding upon either the applicant or the Commission.~~

## **6. Subpart O—Airport Control Tower Stations**

FAA: See changes imbedded below: Rationale: There are not enough channels in the band 121.6-121.925 MHz to accommodate all of the ground control requirements.

### **§ 87.419 Supplemental eligibility.**

(a) Only one control tower or RCO will be licensed at an airport. (b) Each application for an RCO must be accompanied by a written statement from the appropriate FAA Regional Office approving the requested RCO operation. [55 FR 30464, July 26, 1990] **§ 87.421**

### **Frequencies.**

The Commission will assign VHF frequencies after coordination with the FAA.

Frequencies in the following bands are available to control towers and RCOs. Channel spacing is 25 kHz. 118.000–121.400 MHz 121.600–121.925 MHz 123.600–128.800 MHz 132.025–135.975 MHz (a) The frequency 123.100 MHz is available for use by control towers and RCOs at special aeronautical events on the condition that no harmful interference is caused to search and rescue operations in the locale involved. (b)

Frequencies in the bands 200.0– 285.0 and 325.0–405.0 kHz will only be assigned to control towers and RCOs authorized to operate on at least one VHF frequency, unless a showing has been made that elimination of VHF service will not adversely affect life and property in the air. (c) Frequencies in the bands 118.000–121.400 MHz 121.600–121.925 MHz 123.600–128.800 MHz 132.025–135.975 MHz ~~121.600–121.925 MHz~~ are

available to control towers and RCOs for communications with ground vehicles and aircraft on the ground. Channel spacing is 25 kHz. (d) The antenna heights for control towers and RCOs shall be restricted to the minimum necessary to achieve the required coverage. ~~Channel spacing is 25 kHz.~~ ~~(d e)~~ 121.500 MHz: emergency and distress only. [53 FR 28940, Aug. 1, 1988, as amended at 55 FR 30464, July 26, 1990]